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May 27, 2011

Via ECF and Ordinary Mail

Re: **Request For Adjournment Of Motion**
New Jersey Title Ins. Co. v. National Union Fire Ins. Co., et al.
Civil Action No. 2:11-cv-630-DMC-JAD
Our File No. 4543-11615

Honorable Dennis M. Cavanaugh, U.S.D.J.
United States District Court
District of New Jersey
Frank R. Lautenberg U.S.P.O.
Courthouse Building, Room 451
Federal Square, P.O. Box 999
Newark, NJ 07101-0999

Dear Judge Cavanaugh:

We represent the Plaintiff, New Jersey Title Insurance Company, in the above referenced matter. Defendant, National Union Fire Insurance Company of Pittsburgh, has filed a motion to dismiss pursuant to Rule 12(b)(6), which is currently returnable June 20, 2011. National Union is represented by Richard Mills of McElroy, Deutsch, Mulvaney & Carpenter, LLP. The parties jointly request that the motion be adjourned and be made returnable July 18, 2011. Accordingly, Plaintiff's opposition will be due July 5, 2011, and Defendant's reply brief, if any, will be due July 11, 2011.

Thank you for Your Honor's consideration.

Respectfully submitted,


Lisa J. Trembly


Richard S. Mills

LJT:mr

cc: Thomas J. Cahill, Esq. (via ECF)

SO ORDERED:


DENNIS M. CAVANAUGH, U.S.D.J.

ROBERT L. PODVEY

HENRY J. CATENACCI

THOMAS V. HILDNER

J. BARRY COCOZIELLO

II. RICHARD CHATTMAN

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